

Exhibit C

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.  
Technologies, a California corporation;  
MOZILLA FOUNDATION, a California public  
benefit corporation; LAURA CHAMBERS and  
her marital community; WINIFRED MITCHELL  
BAKER and her marital community, and DANI  
CHEHAK and her marital community.

Defendants.

Case No. 2:24-cv-1032

**DEFENDANT DANI CHEHAK'S  
RESPONSES TO PLAINTIFF'S  
SECOND SET OF  
INTERROGATORIES AND  
REQUEST FOR PRODUCTION**

TO: Plaintiff Steve Teixeira

AND TO: Plaintiff's Counsel of Record

Defendant Dani Chehak ("Defendant"), by and through her counsel of record, hereby responds to Plaintiff Steve Teixeira ("Plaintiff") Second Set of Interrogatories and Requests for Production to Defendant Dani Chehak as follows:

**GENERAL OBJECTIONS AND DEFINITIONS**

The following General Objections shall be considered as made, to the extent applicable, in response to each of the Interrogatories and Requests, as if the General Objections were fully set forth in each such response, including those responses which also set forth specific objections.

1. Defendant objects to each Interrogatory and Request to the extent that it seeks to impose obligations beyond those set forth by the Federal Rules of Civil Procedure.

1           2.       Defendant objects to each Interrogatory and Request to the extent that it calls for  
2 the production of documents or information containing trade secrets, proprietary information,  
3 confidential information and other competitively sensitive business or commercial information.

4           3.       Defendant objects to each Interrogatory and Request to the extent that it seeks  
5 privileged documents or privileged information, including, without limitation, documents or  
6 information that were prepared, generated, or received for or in anticipation of litigation,  
7 documents or information that constitute attorney work product, or documents or information that  
8 is protected by a claim of privilege or immunity, including, without limitation, the attorney-client  
9 privilege, common interest or joint defense privilege, or any other applicable privilege or  
10 immunity. Such documents or information shall not be provided in response hereto, and  
11 inadvertent disclosure shall not be deemed a waiver of any privilege, immunity or protection.

12           4.       Defendant objects to each Interrogatory and Request to the extent it is vague,  
13 ambiguous, compound, or does not describe the information sought with sufficient particularity.

14           5.       Defendant's responses to Plaintiff's Interrogatories and Requests are based on  
15 information presently available to Defendant. Defendant reserves the right to supplement and/or  
16 amend these responses or to supply additional documents at a later time, if further information  
17 becomes available in the course of Defendant's diligent inquiries, through discovery or otherwise.  
18 These responses should not be construed as, and do not constitute a waiver of, Defendant's rights  
19 to prove additional facts at trial.

20           6.       Defendant objects to each Interrogatory and Request to the extent it is unduly  
21 burdensome, oppressive, or harassing.

22           7.       Defendant objects to each Interrogatory and Request to the extent that it is overly  
23 broad and not limited in time or scope.

24           8.       To the extent that Defendant states that it will identify or produce documents  
25 responsive to the Requests, this is an indication that Defendant has used reasonable diligence to  
26 locate the requested documents it believes, in the exercise of reasonable business and technological

usage, are relevant, responsive, and non-privileged. To the extent Plaintiff required Defendant to do more than the foregoing, Defendant objects to each and every Request on the ground that it would subject Defendant to oppression, harassment, and undue burden.

#### **ANSWER TO INTERROGATORIES**

**INTERROGATORY NO. 2:** Identify all accounts that you have used in the last five years including, but not limited to, email addresses, social media, phone numbers, blogs, messaging applications (e.g., Signal, Telegram, or Snapchat, or other similar applications and accounts).

#### **ANSWER TO INTERROGATORY NO. 2:**

Defendant objects to this Interrogatory on the grounds that it overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. Defendant also objects to this Interrogatory on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy. Without waiving the objections, Defendant responds as follows:

#### **THE BELOW INFORMATION SHALL BE DESIGNATED AS "CONFIDENTIAL" UNDER THE PARTIES' PROTECTIVE ORDER:**

Phone: 650-353-0596

Social Media/Blogs: Facebook, Pinterest, Instagram, LinkedIn

Emails: dchehak@mozilla.com, chehaks@mac.com

#### **RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 2:** Produce any documents and communications discussing the TK Law report or assessment.

**RESPONSE TO REQUEST NO. 2:**

Defendant objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, documents and/or communications that merely mention the TK Law report or assessment are over encompassing and will not necessarily relate to the relevant claims or defenses at issue in this case.

**REQUEST FOR PRODUCTION NO. 3:** Produce all documents from January 2022 to the present related to or regarding the hiring, transition, succession, or removal of individuals as Mozilla CEO.

**RESPONSE TO REQUEST NO. 3:**

Defendant objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, "all documents" related to the hiring, transition, succession, or removal of individuals as Mozilla CEO from January 2022 to the present are over encompassing and will not necessarily relate to claims or defenses. Defendant also objects to this Request on the grounds that it violates the individual right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy.

1 Dated this 2nd day of April, 2025.

2 DLA PIPER LLP (US)

3 By: s/ Anthony Todaro

4 Anthony Todaro, WSBA No. 30391

5 By: s/ Alexandria Cates

6 Alexandria Cates, WSBA No. 53786

7 701 Fifth Avenue, Suite 6900

8 Seattle, Washington 98104-7029

9 Tel: 206.839.4800

10 E-mail: [anthony.todaro@us.dlapiper.com](mailto:anthony.todaro@us.dlapiper.com)

11 E-mail: [alexandria.cates@us.dlapiper.com](mailto:alexandria.cates@us.dlapiper.com)

12 *Attorneys for Defendants MOZILLA*

13 *CORPORATION a.k.a M.F.*

14 *TECHNOLOGIES, LAURA CHAMBERS,*

15 *WINIFRED MITCHELL BAKER, and*

16 *DANI CHEHAK*

**CERTIFICATION**

The undersigned attorneys for Defendant Dani Chehak have read the foregoing Second Requests for Interrogatories and Requests for Production, and Defendant's answers and responses thereto, and states that they are in compliance with applicable Federal Rules of Civil Procedure and the Local Rules of the Western District of Washington, this 2nd day of April, 2025.

s/ Anthony Todaro

Anthony Todaro, WSBA No 30391

Alexandria Cates, WSBA No. 53789

Attorneys for Defendants Mozilla Corporation, Laura Chambers, Winifred Mitchell Baker, and Dani Chehak

**CERTIFICATE OF SERVICE**

I hereby certify that on April 2, 2025, I caused a true and correct copy of the foregoing document to be served on the parties listed below in the manner indicated:

Amy Alexander Mathew Harrington STOKES LAWRENCE, P.S. 1420 Fifth Avenue, Suite 3000 Seattle, WA 98101-2393 Telephone: (206) 626-6000 Fax: (206) 464-1496 <a href="mailto:Amy.alexander@stokeslaw.com">Amy.alexander@stokeslaw.com</a> <a href="mailto:Mathew.Harrington@stokeslaw.com">Mathew.Harrington@stokeslaw.com</a> <a href="mailto:laura.smith@stokeslaw.com">laura.smith@stokeslaw.com</a> <a href="mailto:sarah.armon@stokeslaw.com">sarah.armon@stokeslaw.com</a> <a href="mailto:Maricarmen.Perez-Vargas@stokeslaw.com">Maricarmen.Perez-Vargas@stokeslaw.com</a> <a href="mailto:anna.armitage@stokeslaw.com">anna.armitage@stokeslaw.com</a>  <i>Attorneys for Plaintiff Steve Teixeira</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input type="checkbox"/> Via the Court's E-Service Device
Darren A. Feider Amanda V. Masters SEBRIS BUSTO JAMES 15375 SE 30th Pl., STE 310 Bellevue, Washington 98007 <a href="mailto:dfeider@sbj.law">dfeider@sbj.law</a> <a href="mailto:amasters@sbj.law">amasters@sbj.law</a> <a href="mailto:epruzinsky@sbj.law">epruzinsky@sbj.law</a> <a href="mailto:kmarchenko@sbj.law">kmarchenko@sbj.law</a>  <i>Attorneys for Defendant Mozilla Foundation</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input type="checkbox"/> Via the Court's E-Service Device

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 2nd day of April, 2025.

s/ Jacey Bittle  
Jacey Bittle, Legal Executive Assistant